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June 30, 2004

*Via ECFS*

Ms. Marlene H. Dortch, Secretary

Mr. John Muleta, Chief  
Wireless Telecommunications Bureau

Mr. David Solomon, Chief  
Enforcement Bureau  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**RE: Notification of the American Samoa Telecommunications Authority  
FRN 0001726488  
CC Docket No. 94-102**

Dear Ms. Dortch and Messrs. Muleta and Solomon:

The American Samoa Telecommunications Authority ("ASTCA"), by counsel and pursuant to Section 1.65 of the Commission's rules, hereby notifies the Commission of its progress in implementing a handset-based Enhanced 911 ("E911") system in the Territory of American Samoa.

Pursuant to the *Order To Stay* 1/ and as discussed in ASTCA's Interim Report, 2/ ASTCA began selling and activating Audiovox 9155 location-capable handsets on August 26, 2003. At that time, ASTCA had not received a request for E911 services from American Samoa's only PSAP, the American Samoa Department of Public Safety

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1/ Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers, *Order to Stay*, 17 FCC Rcd 14841, 14848 ¶ 23, 14856 Appendix A (2002).

2/ Interim Report of the American Samoa Telecommunications Authority, CC Docket No. 94-102 (filed Aug. 1, 2003) ("Interim Report").

("Department of Public Safety"). <sup>3/</sup> As of this writing, ASTCA still has not received a request for E911 services from the Department of Public Safety.

The *Order To Stay* also specifies that ASTCA should ensure that at least 50 percent of all new handsets activated are location-capable as of May 31, 2004. <sup>4/</sup> In this regard, ASTCA is pleased to report that, in May 2004, 63 percent of the handsets sold by and activated by ASTCA were location-capable. ASTCA also wishes to inform the Commission that, during the period beginning December 1, 2003 through May 31, 2004, it activated 221 handsets for which the location-capability is unknown. Thus, these handsets are not included in the 63 percent figure reported here. During that period, ASTCA's retail sales representatives activated handsets that customers purchased elsewhere, and they did not monitor or record the location-capability of the handsets. ASTCA's representatives have since been reminded to collect and record the location-capability of all handsets, even if the handsets are not sold by ASTCA, but merely activated by ASTCA.

With respect to ASTCA's system-wide E911 upgrade, ASTCA had previously reported that it anticipated completion of this upgrade by May 2004, barring unforeseen difficulties. <sup>5/</sup> Regrettably, certain unforeseen difficulties have arisen that have slightly delayed this undertaking. First, Cyclone Heta, which hit American Samoa in January 2004, postponed by several weeks the ability of ASTCA's crew to commence the preliminary technical tasks associated with the upgrade. Specifically, tasks that were scheduled to begin in early January did not get underway until late January.

Second, in March 2004, it was discovered that certain base station equipment needed for coverage of approximately 40 percent of ASTCA's subscriber area, which was ordered from and in consultation with Nortel Networks, would not work with ASTCA's systems. This required ASTCA to place a new equipment order with Nortel. Since then, ASTCA has encountered both manufacturing and shipping delays. The four-week manufacturing time projected by Nortel turned out to be 10 weeks. To make matters worse, the new equipment was stranded at a California port when ASTCA's freight forwarder inadvertently left the shipment behind, thereby necessitating ASTCA to arrange for its airlift to American Samoa. At this point, the estimated time for arrival of the new equipment is July 2004. As a result of these challenges, and barring any additional

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<sup>3/</sup> *Id.* at 4.

<sup>4/</sup> *Order To Stay*, 17 FCC Rcd at 14848 ¶ 23, 14856 Appendix A.

<sup>5/</sup> *See* Interim Report at 4-5. *See also* Letter from Angela E. Giancarlo, counsel for ASTCA, to Marlene H. Dortch, Secretary, FCC, *et al.*, CC Docket 94-102 (submitted Dec. 30, 2003) at 2.

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unforeseen difficulties, ASTCA anticipates completion of the E911 system upgrades by October 2004.

ASTCA hereby reaffirms its commitment to continue to work in good faith to implement E911 service and renews its intention to keep the Commission apprised of its progress on E911 implementation.

Please contact me if you need additional information.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Angela E. Giancarlo". The signature is fluid and cursive, with a long horizontal stroke at the end.

Angela E. Giancarlo

*Counsel to the American Samoa  
Telecommunications Authority*